Doc Code: AP.PRE.REQ

PRE-APPEAL BRIEF REQUEST FOR REVIEW

	Docket Number (Optional) *08005, 0010*

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to "Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450" [37 CFR 1.8(a)] on _____ Signature_____ Typed or printed name _____	**Application Number** *10/624, 490*	**Filed** *07/23/2003*
	First Named Inventor *RALF VIERICH*	
	Art Unit *2166*	**Examiner** *AHN, SANG WOO*

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a notice of appeal.

The review is requested for the reason(s) stated on the attached sheet(s).
     Note: No more than five (5) pages may be provided.

I am the

☐ applicant/inventor.

☐ assignee of record of the entire interest.
See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed.
(Form PTO/SB/96)

☐ attorney or agent of record.
Registration number _____.

☑ attorney or agent acting under 37 CFR 1.34.
Registration number if acting under 37 CFR 1.34 *39, 465*

_____
Signature

JOHN D. HARRIS.
Typed or printed name

(613) 786 - 8671
Telephone number

JULY 17, 2008
Date

NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required.
Submit multiple forms if more than one signature is required, see below*.

☐ *Total of _____ forms are submitted.

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of: VIERICH, Ralf, and FERGUSON, Kevin

Serial No.	: 10/624490	Group Art Unit :	2166
Filed	: July 23, 2003	Examiner	: Ahn, Sangwoo
For	: Parameterised Database Drill-through		
Date	:	Docket No.	: 08005.0010

The Honorable Commissioner of Patents and Trademarks,
P.O. BOX 1450
ALEXENDRIA, VIRGINIA 22313-1450
UNITED STATES OF AMERICA

Pre-Appeal Brief Request For Review

Sir:

The Request is in response to the Final Office Action mailed February 19, 2008.
Pursuant to 1296 Off. Gaz. 2 (July 12, 2005), Applicant requests review of the final
rejection of claims 32-48 in the above-identified application. No amendments are
being filled with this Request. This Request is being filed with a Notice of Appeal.

Arguments begin on page 2 of this paper.

Arguments

Claims 32-48 are pending in this case. Claims 32-48 were rejected under 35 U.S.C. §102(e) as being anticipated by Thomson et al. (US Application 2004/0034615), hereinafter referred to as Thompson.

Claims 41-44 were further rejected under 35 U.S.C. §101 as being directed to a non-statutory subject-matter.

Applicants request a panel review of the rejection under 35 U.S.C. §102(e).

The present claimed invention is directed to a method, a system and storage medium including computer executable code means for navigating from a source report to a target report in a business intelligence application by providing a parameter for an item. The parameter defines an input or an output to a drill-through source or a drill-through target. A parameter mapping is then established between the parameter and the item. The parameter mapping maps context elements from the drill-through source to the item. A drill-through path including the parameter mapping from the drill-through source to the drill-through target is defined. The context of the drill-through source to the drill-through target is then applied in this parameterized drill-through.

Thompson, at least, does not teach or suggest following claimed limitations:

1. providing a parameter for an item, the parameter defining an input or an output to a drill-through source or a drill-through target

In Thompson, the "user first selects the drill through context by pointing and clicking at the data and values of interest in an originating report. This typically consists of picking one or more cell values or members in an originating report and activating the drill through option". *See* paragraph [0062] lines 2-5 of Thompson.

Evidently, Thomson does not teach or suggest a parameter for an item, which defines an input or an output to a drill-through source or a drill-through target.

2. establishing a parameter mapping between the parameter and the item, the
    parameter mapping mapping context elements from the drill-through source to the
    item

In Thompson, the user is presented with a list of appropriate drill-through target reports,
which are determined by the translation system from a list of appropriate target report for
the combination of originating and target data sources. The process and data are
represented as drill data package 104. *See* paragraph [0055] lines 7-12 of Thompson.

A context is determined, i.e. extracted, by the processes included in the client computer
platform, or working in, or with, the data package in which the user drill-through request
has been made. *See* paragraph [0056] lines 1-4 of Thompson. "Translation service 106
translates from the extracted context into the context for the target data source. The
translation service uses translation map 108 (and other parts of a context model and
translation model, as needed) and target report list 110 to perform the translation". *See*
paragraph [0057] lines 8-12 of Thompson.

Evidently, Thomson discloses a context based on user drill-though request, and the use
of a translation map to translate the context into the context for the target data source.
Thomson does not teach or suggest a <u>parameter mapping</u> between the parameter and
the item, the parameter for the item, as discussed in the above, defines an input or an
output to a drill-through source or a drill-through target.

3. defining a drill-through path from the drill-through source to the drill-through target,
    the drill-through path including the parameter mapping

The Examiner stated that Thompson at paragraph 11 lines 10 -12, paragraph 14 lines 3-
7, paragraph 57 lines 8-12 discloses this limitation.

Applicants respectfully disagree.

As discussed in the above, Thompson at paragraph [0057] lines 8-12 discusses the
translation service using a translation map, and does not teach or suggest a parameter
mapping. Thompson at paragraph [0011] lines 9-14 discusses <u>mapping between
databases</u> in general terms, Thompson at paragraph [0014] lines 3-7 discusses, as
throughout the disclosure of Thompson, a mapping engine mapping data between

databases of different types that contain independent data using different relationships, naming conventions, structures, presentation models.

Therefore, Thompson at paragraph [0011] lines 10 -12, paragraph [0014] lines 3-7, or paragraph [0057] lines 8-12 does not teach or suggest a drill-through including the parameter mapping.

   4. applying the context of the drill-through source to the drill-through target

The Examiner stated that Thompson at page 21, lines 4-7, paragraphs 38-39, paragraph 57 lines 8-12, paragraph 105 discloses this limitation.

Applicants respectfully disagree.

As discussed in the above, Thompson at paragraph [0057] lines 8-12 discusses the translation service using a translation map, and does not teach or suggest application of context of the drill-through source. Thompson at page 21, lines 4-7 is part of claim 32 and is directed to "defining translation maps for accessing cube metadata". Thompson at paragraph [0038] describes what "context" is.

In [0105], Thompson states that "... context application, which is the process of applying the context to the target report or data source". Here, Thompson applies the context only to the target report or data source, and is silent about the application of context to the drill-through target.

In fact, Thompson at paragraph [0039] teaches away from Applicants' invention.

In [0039], "'[c]ontext transfer' includes the act of migrating a "slice" from one database/ tool/ report to another...". In other words, context in Thompson is a slice of database/tool/report, and instead of "applying the context of the drill-through source to the drill-through target" as claimed, Thompson migrates the slice.

In order to properly anticipate Applicants' claimed invention under 35 U.S.C. §102, each and every element of the claimed invention must be found, either expressly described or under principles of inherency, in a single prior art reference. Thompson fails to meet this requirement, and provides no teaching that would have suggested the desirability of modification to include such elements. Furthermore, "[t]he identical invention must be

shown in as complete detail as is contained in ... the claim." See M.P.E.P. §2131 (8th Ed., Rev. 3, Aug. 2005), quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126,1236, 9 U.S.P.Q. 2d 191 3, 1920 (Fed. Cir. 1989). Finally, "[t]he elements must be arranged as required by the claim." MPEP 2131 (8th Ed.).

Conclusion

The arguments presented herein are for the purpose of panel review of clear errors in the rejections, and thus Applicants reserve the right to present additional arguments not expressly presented or discussed herein.

For at least the foregoing reasons, Applicants submit that the rejections of claims 32-48 under 35 U.S.C. §102(e) are improper and without basis. Accordingly, Applicants respectfully request that the panel issue a written decision withdrawing the rejection of claims 32-48 under 35 U.S.C. §102(e).

Respectfully Submitted,

John D. Harris
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